

WA 2917

12/29/1988

FILE COPY

RCRA COMPLIANCE
REGION 10

EPA INSPECTION REPORT SUBMITTAL SLIP

I. Submitted By: Bill Adams

Date: 12/29/88

☒ Narrative

☒ Checklist(s)

☒ Photos

☒ Attachment(s)

☐ Comments

COMPANY NAME

Clean Pro P-91

WAD... 2917

Insp of 9/30/88

No CMEL Attached - prev. sub. w/ z's

II. Date Reviewed: 1/10/89

Reviewed By: CP

Title: Chit RLS

☒ Accepted ☐ Returned

III. Comments:

IV. Route To:

- ① Adams - update HWDMS data (its all z's now).
- ② file: RCRA Compliance

USEPA RCRA



3012787

Facility: Chemical Processors Pier 91

Date of Inspection: 9/30/88

ID #: WAD00812917

Mailing Address: 2203 Airport Way South - Suite 400
Seattle, Washington 98134

Report Prepared by: Bill Adams
RCRA Compliance Section

Participants: Peter Ressler, Compliance Manager
Ron Atwood, Operations Manager
Nate Mathews, Plant Manager

Purpose: Determine facility compliance with
applicable hazardous waste regulatory
requirements and implementation of the
CERCLA offsite policy.

Facility Background: A complete description of the facility and
history may be found in the RCRA Facility
Assessment conducted at the Pier 91
facility in April 1988 and previous
inspection reports. The facility's
operations have not changed since these
reports.

Introduction:

I met with the facility representatives at 9 a.m. and discussed the purpose and scope of the inspection. The facility is currently handling oil, oil emulsions, heavy metal wastewater, and bilge slop waste oil for marine oil fuel. The majority of the materials handled by the facility are not regulated under RCRA.

Most waste materials enter the facility via trucks and are sampled for chromium, phenol, emulsability, and solids. If these wastes are manifested, then they go through a fingerprint analysis. Most manifested loads consist of oily water, machine coolant, heavy metal contaminated waters, paint booth rinses and sump water. Sludges are usually handled at the Chempro Georgetown facility. All waste generated by Boeing and received at Pier 91 is manifested whether it is hazardous or not.

Field Inspection

We began the site tour in the facility laboratory where samples are analyzed for identification and selection of treatment methods. Any metal analysis conducted is currently done at the corporate laboratory on Airport Way South. When the Part B is final, an AA will be used at Pier 91 for metal analysis. The next area observed was the receiving area for wastes. There was no evidence of spills in this area and fire extinguishers were located in several locations. We then proceeded to the catwalk over the tank farm. All the tanks were covered and within concrete bermed and paved areas. None of the tanks have high level alarms and are filled using the tank level gauges. According to Nate Mathews, plant manager, tank level gauges are checked two times per day. The following tanks were observed:

Tank 114	- waste oil blend
Tank 106	- sludge dewatering tank
Tank 105	- oil thermal treatment tank
" 107	- oil " " "
" 165	- oily water coolant phenolic material
108	- sludge dewater tank
CT	- reagent sodium hydroxide
110	- oily water coolant, strippers
109	- sludge dewatering tank
111	- " " "
112	- accumulation tank for water discharge. (receives from tanks 96, 97, and 98)
" 113	- PANOCO Tank - boiler fuel diesel mix.
" 118	- storage tank
117	- " "
116	- " "
115	- " "

No active leaks or stained areas were observed. The tanks had recently been painted.

We proceeded on to the large tank storage yard at the south east corner of the property. Chempro owns tanks 94, 96, 97, 98, and 100 in this area. All other tanks are owned by PANOCO. Evidence of a spill was observed around tank 93 and the adjoining wall. This tank is owned by PANOCO. No other evidence of recent leaks or spills was observed in this tank area.

We then proceeded onto the Warehouse storage area. There were no observed wastes stored in this area. The following products used in the treatment processes were observed:

Sodium sulfide, ferric chloride, soap, sulfuric acid, sodium hydride, alcohols, anionic surfactants, sodium silicate, lime, aluminum sulfate, calcium chloride, ferrous sulfate. According to Mr. Mathews these chemicals are usually put into a slurry and then added to the appropriate treatment tank. There was no evidence of spills in this area, all drums were in good condition and clearly marked, and four fire extinguishers were observed in this area. According to Mr. Mathews, Chempro is trying to minimize the number of drums of waste stored at this location in order to maintain it as a generator storage area.

Discussion/Record Review

According to Mr. Atwood, this facility is currently not handling any superfund wastes but this status may change in the future.

Contingency Plan

The contingency plan at the facility had been revised October 6, 1987, and September 19, 1988. The SPCC plan was dated 1987. Based upon review of this plan, it does not include a list of any onsite decontamination equipment as required at 40 CFR §265.52 (e). All other required safety equipment is listed in the contingency plan. In addition the list of potential emergency coordinators does not include the qualifications of the emergency coordinator as required by 40 CFR §265.55. There have been no incidents requiring implementation of the contingency plan since the last inspection.

Waste Analysis Plan

The waste analyses plan at the facility was dated September 26, 1986. Based upon the review of the plan by Tetra Tech, dated January 29, 1988, it complies with the RCRA requirements specified under 40 CFR Part 265. However, the plan has not been amended to incorporate the applicable requirements for analysis of land ban wastes.

Training Plan

Review of the training plan did not reveal any deficiencies. Training records for Dale Wenjel, Richard Stope, Floyd Spato and Jeff Nelson. All employees appeared to have training in 1987 and 1988, but very little training appeared to proceed that period. The training records appeared consistent in terms of the type of training and the amount.

Inspections

Tanks and containers at the facility are inspected on a daily basis. The results of these inspections are put into a daily plan inspection report. Inspection reports for the period April - September 1988, were observed. The inspection records review appeared complete. These records are completed from field notes by Nate Mathews.

The facility currently has a contractor conduct an annual inspection of the foam fire fighting system. However, the facility does not have a written inspection schedule for safety equipment and eyewash stations.

Closure Plan/Financial Assurance

The closure plan at the facility was dated September 18, 1987. The total closure cost estimate was \$636,102. The total financial assurance for closure/post closure was \$971,024, as outlined in the letter from Chempro to EPA dated March 24, 1988.

The closure plan was evaluated by Tetra Tech in their January 29, 1988, review. The regulatory deficiencies of the Chempro closure plan include:

1. Inadequate definition and detail of the facility closure schedule, such as procedures for closure modification and certification, techniques to be used for closing individual waste management units, and methods for determining decontamination efficiency.
2. Incorrect closure cost estimates.
3. Greater detail needs to be provided in the decontamination procedures and soil sampling procedures including sample preparation and handling.

These deficiencies are discussed in greater detail in the Tetra Tech report.

Manifests

Hazardous wastes received by the facility are primarily from Boeing. These wastes are identified as WT02, Hazardous Liquid N.O.S., and chrome water D007, WT02. Other manifested waste included materials from the Chemical Processor Georgetown facility.

Waste generated by Pier 91, include: waste petroleum naptla (D001) handled by Safety Kleen, coolant slops to Lucile Street, waste combustibe liquid (D001) to Lucile Street, and f - listed wastes (from the tank 110 distillation unit) to Lucile Street.

The inspection was concluded at 4:00 p.m. with an overview of potential violations.

Summary of Potential Violations

1. The facility did not have a written inspection schedule for safety equipment and eyewash stations as required by 265.15.
2. The waste analysis plan does not include procedures for identification and analysis of land baned wastes.
3. The contingency plan does not include a list of on-site decontamination equipment or the qualifications of the emergency coordinator.
4. The closure plan is inadequate in the areas of closure schedule, closure procedures, and decontamination procedures.
5. Financial Assurance for closure is incorrect and the closure cost estimates do not provide for disposal of decontamination rinsate.